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10 COMPASS PARTNERS, LLC,
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13

14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 IN RE: Case No. 2:07-CV-892-RCJ-GWF-BASE
17 USA COMMERCIAL MORTGAGE Consolidated with Case Nos.
18 COMPANY, 2:07-cv-1389-RCJ-GWF
19 Debtor. 3:07-cv-00241-RCJ-GWF
20 2:07-cv-00894-RCJ-GWF
21 3685 SAN FERNANDO LENDERS, LLC,
22 *et al.*,
23 Plaintiffs,
24 v.
25 COMPASS USA SPE, LLC, *et al.*,
26 Defendant.
27

28 **PROPOSED VOIR DIRE OF DEFENDANTS**
COMPASS PARTNERS, LLC, COMPASS USA SPE, LLC,
BORIS PISKUN, AND DAVID BLATT

Defendants COMPASS PARTNERS, LLC, COMPASS USA SPE, LLC, BORIS
PISKUN and DAVID BLATT, to the extent the Court will permit them to do so in light of the
January 25, 2010 entry of default against them, offer the following proposed voir dire questions
for the Court's consideration:

1 1. Are any of you familiar with any of the individual Plaintiffs in this case?

2 (Identify by name or display caption to jury.)

3 2. Are any of you familiar with any of the other named parties in this case? (Identify
4 by name or display caption to jury.)

5 3. Are any of you familiar with any of the attorneys present in the courtroom who
6 will be trying this case? (Identify by name and law firm.)

7 4. Have any of you or the members of your immediate family been represented by
8 the law firms of Jones Vargas, located in Reno and Las Vegas, or Bickel & Brewer, located in
9 Dallas, Texas?

10 5. Have any of you or the members of your immediate family been adverse to the
11 law firm of Jones Vargas or Bickel & Brewer in a legal matter?

12 6. Are any of you familiar with attorneys Daniel Hayward or Justin Vance of the
13 Laxalt & Nomura law firm?

14 7. Have any of you or members of your immediate family been represented by the
15 law firm of Laxalt & Nomura?

16 8. Have any of you or the members of your immediate family been adverse to the
17 law firm of Laxalt & Nomura in a legal matter?

18 9. Are any of you or members of your immediate family employed in the fields of
19 accounting, banking, real estate, or finance?

20 10. Do any of you or members of your immediate family hold college degrees in
21 accounting, business, or finance?

22 11. Do any of you have any legal experience as an attorney, paralegal, legal secretary,
23 or as an employee of a law firm, district attorney or public defender's office?

24 12. Do any of you or the members of your immediate family have any legal training?

1 13. Have any of you or members of your immediate family been a plaintiff in a
2 lawsuit other than a divorce or child custody proceeding?

3 14. Do any of you believe that you will have difficulty extending the same
4 consideration and fairness to a corporation or limited liability company, such as Compass
5 Partners, LLC and Compass USA SPE, LLC, that you would extend to individuals?

6 15. Have any of you or a member of your immediate family been forced into home
7 foreclosure by the recent national recession?

8 16. Have any of you or a member of your immediate family been forced to sell a
9 house on a short-sale basis as the result of the recent national recession?

10 17. Have any of you or a member of your immediate family been laid off, fired, or
11 had your wages or hours reduced by an employer as a result of the recent national recession?

12 18. Do any of you hold strong beliefs regarding the cause or causes of the recent
13 national recession?

14 19. Do any of you have strong negative feelings toward persons employed in the
15 banking, lending, or financial services industries? If so, would those feelings make it difficult
16 for you to be fair to a defendant who is involved or was involved in any of these industries?

17 20. Can each of you agree to set aside you personal opinions and beliefs, and follow
18 the law as it is provided to you by the Court?

19 21. If you are selected to serve as a juror in this case, you must listen to the evidence
20 and decide what the facts are in this case. Do any of you hold personal beliefs or opinions which
21 would prohibit you from concluding, under any circumstances, that a testifying witness did not
22 tell the truth, or exaggerated, or made an honest mistake?

23 22. Do any of you hold personal beliefs which would lead you to award the Plaintiffs
24 in this case any particular amount of money damages they may request, even if such an award is
25 not supported by the evidence and the law?

1 23. Do any of you believe you will have difficulty keeping an open mind and
2 reserving judgment until you have heard all of the evidence in this case from both the Plaintiffs
3 and the Defendant?

4 DATED this 8th day of November, 2010.

LAXALT & NOMURA, LTD.

By: 

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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of LAXALT & NOMURA, LTD., and that on this _8th_ day of November, 2010, I caused a true and correct copy of the foregoing to be served:

_VIA ELECTRONIC SERVICE

addressed as follows:

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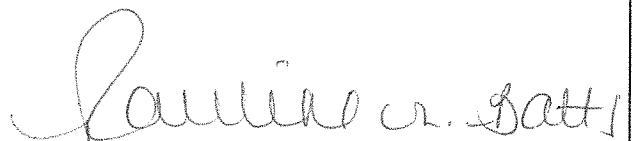
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